Certificate of Notice Page 1 of 5

United States Bankruptcy Court Eastern District of Pennsylvania

In re: Robertin Nunez Debtor Case No. 15-15811-mdc Chapter 13

CERTIFICATE OF NOTICE

District/off: 0313-2 User: YvetteWD Page 1 of 1 Date Rcvd: Feb 26, 2020

Form ID: pdf900 Total Noticed: 1

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Feb 28, 2020.

db +Robertin Nunez, 2164 Palethorp Street, Philadelphia, PA 19122-1613

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center. NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Feb 28, 2020 Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on February 26, 2020 at the address(es) listed below:
ANDREW F GORNALL on behalf of Creditor JPM

on behalf of Creditor JPMORGAN CHASE BANK, NATIONAL ASSOCIATION agornall@kmllawgroup.com, bkgroup@kmllawgroup.com

on behalf of Creditor ANDREW F GORNALL JPMorgan Chase Bank, National Association agornall@kmllawgroup.com, bkgroup@kmllawgroup.com

ANN E. SWARTZ on behalf of Creditor Specialized Loan Servicing LLC ecfmail@mwc-law.com, ecfmail@ecf.courtdrive.com

BEN VAN STEENBURGH on behalf of Creditor Barbara Marshall lawyers@adlawfirm.com, ddenenberg@adlawfirm.com

DAVID M. OFFEN on behalf of Debtor Robertin Nunez dmo160west@gmail.com,

davidoffenecf@gmail.com;offendr83598@notify.bestcase.com

JILL MANUEL-COUGHLIN on behalf of Creditor WELLS FARGO BANK, NA bankruptcy@powerskirn.com KEVIN S. FRANKEL JPMORGAN CHASE BANK, NATIONAL ASSOCIATION on behalf of Creditor

pa-bk@logs.com

KEVIN S. FRANKEL on behalf of Creditor Specialized Loan Servicing LLC pa-bk@logs.com KEVIN S. FRANKEL on behalf of Creditor JPMorgan Chase Bank, National Association

pa-bk@logs.com KRISTEN D. LITTLE on behalf of Creditor Specialized Loan Servicing LLC pabk@logs.com

LEEANE O. HUGGINS on behalf of Creditor JPMorgan Chase Bank, National Association pabk@logs.com

JPMORGAN CHASE BANK, NATIONAL ASSOCIATION LEEANE O. HUGGINS on behalf of Creditor pabk@logs.com LEONA MOGAVERO on behalf of Creditor

Emigrant Mortgage Company, Inc lmogavero@fsalaw.com, mprimavera@fsalaw.com MARIO J. HANYON on behalf of Creditor Specialized Loan Servicing LLC paeb@fedphe.com

MEGAN N. HARPER on behalf of Creditor karena.blaylock@phila.gov

City of Philadelphia megan.harper@phila.gov,

MICHAEL J. CLARK on behalf of Creditor Specialized Loan Servicing LLC mjclark@logs.com THOMAS I. PULEO on behalf of Creditor JPMORGAN CHASE BANK, NATIONAL ASSOCIATION tpuleo@kmllawgroup.com, bkgroup@kmllawgroup.com

United States Trustee USTPRegion03.PH.ECF@usdoj.gov WILLIAM C. MILLER, Esq. ecfemails@ph13trustee.com,

ecfemails@ph13trustee.com, philaecf@gmail.com

TOTAL: 19

1 Nunez a/k/a robert Nunez Stipulation Bankruptcy Case # 15-15811/MDC

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Robertin Nunez a/k/a robert Nunez, Debtor.

CHAPTER 13

Specialized Loan Servicing, LLC,

BANKRUPTCY CASE NUMBER 15-15811/MDC

Movant,

11 U.S.C. § 362

Robertin Nunez a/k/a robert Nunez, Debtor, William C. Miller, Trustee,

Additional Respondent.

STIPULATION AND ORDER

AND NOW, in consideration of the mutual promises and agreements set forth below, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, it is hereby stipulated and agreed to by and between the undersigned as follows:

- 1. This Stipulation shall govern all post-petition payments due and owing to Movant, including those that fall due after the arrears, as set forth below, are cured.
- The post-petition arrearages on the mortgage held by Movant on Debtor's property at 3717 North 16th Street, Philadelphia, PA 19140 (the "Property"), are \$4,317.84. The breakdown of the arrears is as follows:

Post-Payments from 11/01/2019 to 02/01/2020 at \$831.23 each	\$3,324.92
Suspense Balance	(\$238.08)
Bankruptcy Fees	\$1,050.00
Bankruptcy Costs	\$181.00

- 3. If Debtor provides proof of negotiated payments not already credited, they will receive credit for those payments.
 - 4. Debtor shall cure the arrearages in the following manner:

2 Nunez a/k/a robert Nunez Stipulation Bankruptcy Case # 15-15811/MDC

- (a) A lump sum payment of \$2,800.00 shall be made on or before February 24, 2020;
- (b) The balance of the arrears, to-wit, \$1,517.84, shall be cured by the Debtor in six (6) consecutive payments commencing on March 1, 2020. The Debtor shall pay the sum of \$252.97 for five (5) consecutive months. The Debtor shall pay the sixth (6th) and final payment of \$252.99 to cure the arrears on August 1, 2020; until the arrears are cured, together with the regular monthly mortgage payment.
- (c) Debtor shall resume making the regular monthly mortgage payments on March 1, 2020 in the amount of \$831.23, or as same may be adjusted from time to time in accordance with Paragraph (f);
- (d) Should Debtor's regular monthly payment amount change, Debtor shall be notified of such change, and the monthly payment amount due under the terms of the Stipulation shall change accordingly;
- (e) All payments to Movant shall include the Loan No. written on the face thereof, and shall be made directly to Attention: BANKRUPTCY DEPARTMENT, Specialized Loan Servicing, LLC, at P.O. Box 636007 Littleton, Colorado 80163;
- (f) All payments made pursuant to this Stipulation and Order shall be applied first to reimburse Movant for its attorneys' fees and costs (as provided for above) in connection with this motion. All further payments will be applied to the arrears and/or monthly payments in the manner prescribed by the Mortgage and Note.
- 5. In the event that Debtor fails to make any of the payments set forth above,
 Movant shall notify Debtor and Debtor's attorney of the default in writing and Debtor may cure
 the default within 15 days of the notice. If the default continues to the following month, the
 Debtor shall include funds to cure that month's default as well. If Debtor should fail to cure the

3 Nunez a/k/a robert Nunez Stipulation Bankruptcy Case # 15-15811/MDC default within 15 days, Movant may file a Certification of Default with the Court, and upon the filing of the Certification, Debtor consents to the Court entering an Order granting Movant relief

from the Automatic Stay.

- 6. In the event the instant bankruptcy case is converted to a case under Chapter 7, this shall constitute a default under the terms of this Stipulation. Debtor shall cure the prepetition and post-petition arrears within ten (10) days from the date of conversion. Should the Debtor fail to cure the arrears within ten (10) days from the date of conversion, counsel for Movant may file a Certification of Default with the Court and the Court shall enter an Order granting relief from the automatic stay as to the Property.
- 7. After Movant sends one (1) Notice of Default for Debtor's failure to remain postpetition current, then Movant may file a Certification of Default with the court instead of sending a second Notice of Default.
- 8. Debtor understands that should Movant be forced to provide a written Notice of Default of this Stipulation, that Debtor shall be responsible for any reasonable attorney fees of \$100.00 per Notice of Default and \$200.00 per Certification of Default incurred by Movant as a result of preparation of same.

4 Nunez a/k/a robert Nunez Stipulation Bankruptcy Case # 15-15811/MDC

9. Debtor agrees that the Court may waive Rule 4001(a) (3), permitting Movant to immediately implement and enforce the Court's order.

The parties request that this Honorable Court approve this stipulation.

	2/13/2020	/s/ Michael J. Clark	
Dated: _		Michael J. Clark, Esquire Attorney for Movant	;
Dated: _		David M. Offen, Esquire, Attorney for Debtor	The Curtis Center
Dated: _	2/08/2020	William C. Malbert C. Trustee	er 'O OBJECTION
	ND NOW, this 26th CED that the foregoing Stipulation is		

BY THE COURT:

MAGDELINE D. COLEMAN CHIEF U.S. BANKRUPTCY JUDGE

Magdelin D. Colem